

Hecker Fink LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.HECKERFINK.COM

DIRECT EMAIL dpatton@heckerfink.com

October 28, 2024

BY ECF

The Honorable Katherine Polk Failla
U.S. District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Roman Storm, 23 Cr. 430 (KPF)*

Dear Judge Failla:

On behalf of Roman Storm, we write to respectfully request a brief extension of today's deadline to notice any advice of counsel defense and for the government to produce any Rule 404(b) disclosures. *See* Oct. 10, 2024 Tr. at 17. The government consents to this request. Specifically, we propose that both deadlines be moved by two days to Wednesday, October 30, 2024, which would provide the defense further time to prepare any necessary disclosure.

Respectfully submitted,



David Patton
Hecker Fink LLP

-and-

Brian E. Klein
Keri Curtis Axel
Kevin M. Casey
Waymaker LLP

Attorneys for Roman Storm

Cc: Counsel of Record